

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

JAMES HEARNS, JR.,

Plaintiff,

vs.

JEFF WYLER FAIRFIELD, *et. al.*,

Defendants.

Case No. 1:02cv00496

(Judge Bertelsman)

AFFIDAVIT OF  
CARLA COMBS

STATE OF OHIO )


)SS

COUNTY OF HAMILTON )

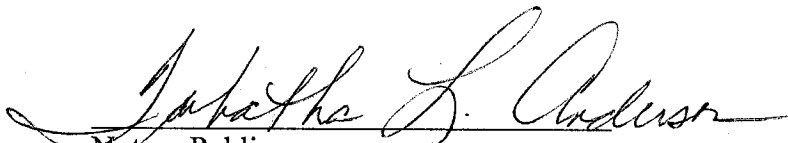
Now comes Affiant, and after being duly sworn and cautioned, states as follows:

1. I am Carla Combs. I was an employee of Jeff Wyler from 1977 until 1999.
2. I am familiar with James Hearns and have personal knowledge of discriminatory conduct on the part of Wyler management against James Hearns.
3. I heard Duncan Riddle refer to Hearns as a "nigger" on numerous occasions.
4. ~~Chuck Adomitis~~ <sup>Duncan Riddle</sup> also made several racist comments about Hearns, including telling Hearns that black people were all alike.
5. The managers at Jeff Wyler treated Hearns with a total lack of respect. The managers would pretty much ignore Hearns and would roll their eyes when he said something.
6. The managers did not treat white salesman in this manner. White salesman were always treated with respect.
7. When I gave a statement in support of James Hearns' claim of racism, as I had witnessed racist statements, I was accused of theft, terminated, and charged with a crime by Jeff Wyler's management.
8. The charges were later dismissed because they lacked merit. The charges were false and contrived.
9. I believe this was retaliation for me providing support to James Hearns complaint of racial discrimination.

10. Further affiant sayeth naught.

  
Carla Combs

Sworn to and subscribed to in my presence on this 27<sup>th</sup> day of June, 2005, by  
Carla Combs.

  
Notary Public

TABATHA L. ANDERSON  
NOTARY PUBLIC, STATE OF OHIO  
MY COMMISSION EXPIRES 07-22-07